

1 memory is, it is.

2 A Well, I --

3 Q Give me your best recollection.

4 A For convenience sake, I think it's, I think it's all  
5 of them, maybe with the exception of one of the foreign  
6 corporations.

7 Q And are you a director of any of the TBN companies?

8 A No.

9 Q What about the Nevis Corporation? I think -- my --  
10 I thought you were a director of that.

11 A Oh, yeah, that's so incidental. I don't do that  
12 much for it any more. Yes.

13 Q Are you a director, to your recollection, of any  
14 other of the, of the TBN corporations? If you can recall.

15 A I, I can't recall. There's a possibility there may  
16 be one or two, but I, I just can't think of them right now.

17 Q Thank you. Now, is Al Brown your supervisor?

18 A Not really, he is chief of staff, but I report  
19 directly to Mr. Crouch.

20 Q Was Phillip Crouch your supervisor?

21 A He was chief of staff but Mr. Crouch has always been  
22 my direct supervisor.

23 Q I want to show you a document which I, I think you  
24 were shown in deposition but, in any event, I wanted to have  
25 marked for identification.

1 MR. COHEN: What, what's my next number, Your Honor?

2 JUDGE CHACHKIN: 211.

3 MR. COHEN: Thank you.

4 (Pause.)

5 MR. COHEN: I'd like to have marked for  
6 identification, Your Honor, if you would, Glendale  
7 Exhibit 211, which is a document five pages long, which is on  
8 the -- I guess it's an absence report.

9 MR. MCCURDY: Excuse me --

10 JUDGE CHACHKIN: The document described is marked  
11 for identification as Glendale Exhibit 211.

12 (Whereupon, the document referred to  
13 as Glendale Exhibit 211 was marked  
14 for identification.)

15 MR. MCCURDY: Mr. Cohen, could I get --

16 MR. COHEN: Oh, excuse me, I apologize. I'm -- no  
17 offense intended. I just -- please -- I didn't mean to slight  
18 you there.

19 BY MR. COHEN:

20 Q Do you recognize that document, ma'am, those five  
21 pages?

22 A Yes.

23 Q Would you describe please to -- for me what this,  
24 what this document is, this absence report?

25 A It's just a notice of when I would take a, a day

1 off.

2 Q And that's the procedure, I take it, that, that is  
3 followed at TBN, one completes an absence report like this?

4 A Generally these were done by my secretary.

5 Q I see. Now, I noticed that on page 50445 --

6 MR. COHEN: Well, let me just first state for the  
7 record, Your Honor, these documents came from the files of, of  
8 Trinity and NMTV, the reports.

9 BY MR. COHEN:

10 Q But I note on document 50445 that it states that  
11 Al Brown is the name of the supervisor. Do you see that?

12 A Yes.

13 Q Yes, and I notice on 5447 it says the same thing?

14 MR. SHOOK: Your Honor, if I may, at this point, I,  
15 I believe the record is going to be a little bit confused if  
16 we have two sets of numbers being referred to in the sense the  
17 these numbers that appear at the bottom of the --

18 MR. COHEN: Your point is well taken.

19 JUDGE CHACHKIN: Why don't we refer to --

20 MR. TOPEL: Why don't we pre-number them?

21 MR. COHEN: Okay, let's -- let me number the pages.

22 Thank you, Mr. Shook, that's very helpful and I was, I was in  
23 my deposition mode because during the depositions, Your Honor,  
24 we identified them as -- by date stamp number. Thank you for  
25 that. That's, that's helpful. I'm, I'm numbering these

1 pages.

2 (Pause.)

3 BY MR. COHEN:

4 Q Four, page 4, has Phil Crouch's name in there as  
5 your supervisor, do you see that?

6 A Yes.

7 Q Okay, and five has, has Paul Crouch. Correct?

8 JUDGE CHACHKIN: Is that correct? You have to  
9 answer or else the reporter can't take down your response. If  
10 you say "um-hum" that doesn't tell us --

11 MRS. DUFF: Yes. I'm sorry.

12 BY MR. COHEN:

13 Q Remember, Mrs. Duff, in the deposition we had the  
14 same situation where you have to say "yes" or "no." It's  
15 difficult for the reporter to pick it up if you're, if you're  
16 not -- if you don't say "yes" or "no." And shaking your head  
17 is a no-no. That's -- also.

18 A I apologize.

19 Q No, not to worry. Who prepared these, these five  
20 pages?

21 A Probably my secretary.

22 MR. COHEN: I'd like to offer them, Your Honor.

23 JUDGE CHACHKIN: Any objection?

24 MR. TOPEL: No, Your Honor.

25 JUDGE CHACHKIN: Glendale Exhibit 211 is received.

1 (Whereupon, the document previously  
2 marked for identification as Glendale  
3 Exhibit 211 was received into  
4 evidence.)

5 MR. COHEN: Your Honor, I'd like to have marked for  
6 identification as Glendale Exhibit 212, a 1-page document.

7 (Pause.)

8 MR. COHEN: Which purports, Your Honor, to be a  
9 biography of the witness.

10 JUDGE CHACHKIN: The document described by counsel  
11 is marked for identification as Glendale Exhibit 212.

12 (Whereupon, the document referred to  
13 as Glendale Exhibit 212 was marked  
14 for identification.)

15 BY MR. COHEN:

16 Q Now, do you recognize this document, Mrs. Duff? I  
17 can help your memory if you --

18 MR. TOPEL: Yes, and I'd like to remind the witness  
19 to take ample time to read the documents that she's being  
20 presented with.

21 JUDGE CHACHKIN: The witness needs time to review  
22 the documents. We'll go off the record for that purpose.

23 (Whereupon, a brief recess was taken.)

24 JUDGE CHACHKIN: Miss Cohen -- Mr. Cohen?

25 BY MR. COHEN:

1 Q Do you recognize --

2 (Whereupon, a brief recess was taken.)

3 MRS. DUFF: I, I think I have seen it. I, I can't  
4 connect it to anything specific.

5 BY MR. COHEN:

6 Q Let, let me help you. I am not going to be offering  
7 through you, but I'm -- I, I received a series of documents  
8 from your counsel, Mr. Topel, after discovery was completed  
9 concerning the Community Brace matter, which I'm -- I will be  
10 asking you about. Attached as part of that package was the  
11 page that you have before you. You can accept that. As a, as  
12 an officer of the Commission, I represent that to you.

13 MR. TOPEL: Mr. Cohen, I have no problem if you want  
14 to show her the Community Brace file and where it fits in  
15 there. That may --

16 MR. COHEN: I have -- I'll be glad to do that. I, I  
17 haven't -- I wasn't going to question her about this file but  
18 I'll be glad to --

19 JUDGE CHACHKIN: Well, perhaps that will help her --

20 MR. COHEN: Sure.

21 JUDGE CHACHKIN: -- assist her in remembering where  
22 the document came from.

23 MR. COHEN: And I'll, I'll even -- would it be  
24 helpful if I found where it was in the package for the  
25 witness, or should I let her find it herself. I mean, I'll be

1 glad to do whatever you want --

2 JUDGE CHACHKIN: No, I, I think you can do that.

3 MR. TOPEL: No, I think you should show her where it  
4 is.

5 MR. COHEN: Let me find it, then.

6 (Pause.)

7 BY MR. COHEN:

8 Q I'm sorry I didn't have it marked here. It's, it's  
9 page 50 of this package, Mrs. Duff.

10 MR. COHEN: Can I approach the witness, Your Honor?

11 JUDGE CHACHKIN: Yes, you may.

12 BY MR. COHEN:

13 Q Page 50 in this package. Take as much time as you  
14 need to familiarize yourself with it. I'm not going to be  
15 questioning you about that now but --

16 MR. TOPEL: But the purpose, the purpose of this is  
17 to focus on -- focus the witness on page 50 and whether that  
18 helps her recollection --

19 MR. COHEN: Exactly, exactly.

20 MR. TOPEL: -- of the context in which it was  
21 prepared.

22 MR. COHEN: You stated it much better than I did.  
23 As usual. So is it now -- I can take that back so I won't  
24 burden you with another copy.

25 BY MR. COHEN:

1 Q Is it, is -- do you now have it clear in your mind,  
2 ma'am --

3 A Yes.

4 Q -- about the, the biography? Now, did you prepare  
5 that biography?

6 A I think I did. It was hastily prepared. We were  
7 against a deadline. It's not very well stated, but I think I  
8 did put it together.

9 Q And it was put together in connection with preparing  
10 documents for the Community Praise -- Brace Project, is that  
11 correct?

12 A Right.

13 MR. COHEN: I'd like to offer that, Your Honor.

14 JUDGE CHACHKIN: Any objections?

15 MR. TOPEL: No, Your Honor.

16 JUDGE CHACHKIN: Glendale Exhibit 212 is received.

17 (Whereupon, the document previously  
18 marked for identification as Glendale  
19 Exhibit 212 was received into  
20 evidence.)

21 BY MR. COHEN:

22 Q Now, as part of your duties, am I correct that  
23 you're available to Dr. Crouch for any special projects that  
24 he would have you follow up on?

25 A That's correct.



1 Q Is an example of a special project your traveling to  
2 Nevis in the West -- in the British West Indies to help set up  
3 the station that was constructed there.

4 A I was a director for that corporation.

5 Q But is that an example of a special project, when  
6 you went there and, and worked assiduously to put the station  
7 on the air, or help put it on the air?

8 A As a director, yes.

9 MR. COHEN: I wonder, Your Honor, if I could ask my  
10 friend Mr. Topel to put before the witness a few Glendale  
11 exhibits? If -- mine are marked up. That's why I don't want  
12 to do it.

13 JUDGE CHACHKIN: What exhibit numbers are you  
14 talking about?

15 MR. COHEN: Yes, I'm talking about Exhibits 94  
16 through 97.

17 MR. TOPEL: My problem is I'm not sure mine aren't  
18 marked up either. Maybe we should get the court reporter's  
19 copy.

20 MR. COHEN: If we have a court reporter's copy,  
21 let's use it.

22 (Asides.)

23 MR. COHEN: We have, we have a set, Your Honor.

24 JUDGE CHACHKIN: Okay, all right.

25 MR. TOPEL: We have a set.

1 JUDGE CHACHKIN: Fine.

2 MR. COHEN: Thank you very much for doing that,  
3 Chris. If you'd just focus her, Howard, I'd be grateful.

4 JUDGE CHACHKIN: Do you want her to have all your  
5 exhibits?

6 MR. COHEN: Just those three, Your Honor.

7 MR. TOPEL: Well, they're in a volume.

8 JUDGE CHACHKIN: At this time, or is he going to  
9 have other reference to other exhibits?

10 MR. COHEN: I may. I'm not sure.

11 JUDGE CHACHKIN: All right, let's proceed now. Go  
12 ahead.

13 BY MR. COHEN:

14 Q First let me tell you the, the only question I'm  
15 going to have, well, and then you can look at -- spend as much  
16 time as you need.

17 MR. TOPEL: He's going --

18 MR. COHEN: Sure, why --

19 MR. TOPEL: 94, 95, and 96 --

20 MR. COHEN: 94, 95, and 96.

21 MR. TOPEL: -- is what he wants to ask you questions  
22 about.

23 MR. COHEN: Ninety-four through ninety-seven.

24 MR. TOPEL: Ninety-four through ninety-seven.

25 MR. COHEN: Yes.

1 BY MR. COHEN:

2 Q First let me tell you the question and then spend as  
3 much time as you need. Wait for Mr. Topel. I want to wait  
4 for him to get back to -- the question is a simple one. Are  
5 these documents illustrative of the kinds of assignments that  
6 you received from Dr. Crouch in carrying out your duties as  
7 assistant to the president? That's the question.

8 (Pause.)

9 A Through 97?

10 JUDGE CHACHKIN: Yes, through 97.

11 BY MR. COHEN:

12 Q Yes, ma'am.

13 A Yes.

14 Q Thank you. Thank you, I'll take -- you have enough  
15 to bother with up there. Let me just take that. I want to  
16 ask you a question, if you would. Would you turn to your  
17 testimony, and I know you have several volumes, and when I ask  
18 you about your testimony, I'll try, I'll try to be clear. I'm  
19 now talking about Volume 2A-1, which is -- has the caption  
20 "101." Perhaps Mr. Topel will help you.

21 (Asides.)

22 MR. TOPEL: Can we have the volume?

23 MR. COHEN: Yeah.

24 BY MR. COHEN:

25 Q I'm interested in pages 55 through 57. What, what

1 I'd like you to look at for purposes of answering my question,  
2 if I could, if I could ask you to do this, is look at  
3 sub-paragraph E, which, which starts on the, on the sort of  
4 the bottom of 55, goes, goes through 56, and at the top of 57.  
5 Just read it, just read it enough to familiarize yourself with  
6 it. I'm not going to be asking you detailed questions about  
7 the information set forth therein, I promise you.

8 (Pause.)

9 A Yes.

10 Q Now, was the information set forth in paragraph --  
11 sub-paragraph E, was that in the files of NMTV or was that  
12 somewhere else?

13 A I had a file, NMTV file, and I think others had a  
14 file, also, that was submitted in the document production.

15 Q Well, the information as set forth in  
16 sub-paragraph E, was the information as set, set forth  
17 therein, did that come from, from your NMTV file or did it  
18 come from another source?

19 MR. TOPEL: Your Honor, I, I just object on, on  
20 overbreadth and vagueness. There's a lot of information in  
21 paragraph E, not all of which necessarily came from any file.

22 MR. COHEN: Let me rephrase the question.

23 MR. TOPEL: I think that the question can be  
24 phrased --

25 MR. COHEN: Let me rephrase the question.

1 MR. TOPEL: -- in a way that the witness may not be  
2 confused.

3 JUDGE CHACHKIN: Well, rephrase the question.

4 MR. COHEN: I'll accept that, Your Honor.

5 JUDGE CHACHKIN: Okay.

6 BY MR. COHEN:

7 Q Is, is the, is the information as set forth in  
8 sub-paragraph E, did that come from several sources?

9 A I did have an NMTV file on Community Brace, but I  
10 understand that there were some of the sources that came from  
11 other people's files, and just general information from  
12 that -- there might not have been anything in a file.

13 Q Well, the information that's set forth in  
14 paragraph E, did you write this out in your own hand, or did  
15 this come from someone else, or did you get assistance? Just  
16 how did it work?

17 A Mr. Topel asked me some questions and I answered his  
18 questions, and he put it into a form such as you see.

19 Q Did you send Mr. Topel documents containing all or  
20 some of the facts that are set forth in paragraph E?

21 A The majority of it.

22 Q Came from your file?

23 A Yes.

24 Q And that was the NMTV file that you referred to?

25 A Yes.

1 Q Now, was Community Brace a for-profit corporation?  
2 Do you know what I mean by a for-profit corporation?

3 A Yes, it was a for-profit corporation.

4 Q And Reverend Hill was an officer of that  
5 corporation, was he not?

6 A That's correct.

7 Q And he was a director, was he not?

8 A That's correct.

9 Q And he was a stockholder, was he not?

10 A Yes.

11 Q Okay, and it's true that he stood to gain  
12 financially if the loan from NMTV and TBN to Community Brace  
13 had been effectuated, am I correct?

14 A That's correct.

15 (Pause.)

16 Q Now, I can show you the documents if, if, if this is  
17 helpful, but my review of the minutes does not state that  
18 there are any -- there was any mention in the minutes of the  
19 fact that NMTV chose not to go forward and effectuate the  
20 Community Brace loan. I first need to lay a foundation. Is  
21 that correct? We can go through the minutes together if  
22 that's necessary.

23 A Well --

24 Q But we did this, we did this during your deposition,  
25 and I think you confirmed it, and I'll be -- I'll show you

1 | your deposition testimony if that will move things along, but  
2 | I think there's nothing in the minutes to reflect the decision  
3 | not to go forward. So first I want to find out, do you agree  
4 | with that?

5 |       A       I don't remember seeing anything in the minutes.

6 |       JUDGE CHACHKIN: The witness has stated she doesn't  
7 | remember seeing anything in the minutes so --

8 |       MR. COHEN: Well, I don't know where that leaves me,  
9 | Your Honor.

10 |       JUDGE CHACHKIN: Well, that means she doesn't  
11 | remember seeing anything. Then we'll have to accept the fact  
12 | that there are nothing in the minutes unless --

13 |       MR. COHEN: Can we get a stipulation on that?

14 |       MR. TOPEL: Yes.

15 |       MR. COHEN: Okay.

16 |       MR. TOPEL: There, there -- I don't believe there's  
17 | a minute that reflects that.

18 |       JUDGE CHACHKIN: All right.

19 |       MR. COHEN: So what we're stipulating to here --

20 |       JUDGE CHACHKIN: All right, the stipulation is  
21 | accepted. There is nothing in the minutes referring to this  
22 | decision.

23 |       MR. COHEN: Now --

24 |       COURT REPORTER: I'd like to change the tape, sir.

25 |       JUDGE CHACHKIN: Yes, go ahead.

1 (End of tape 3; start of tape 4.)

2 (Whereupon, a brief recess was taken.)

3 COURT REPORTER: Please continue.

4 JUDGE CHACHKIN: All right, then, Mr. Cohen.

5 BY MR. COHEN:

6 Q Is there any reason why the decision not to go  
7 forward with the Community Brace project was not reflected in  
8 the minutes of NMTV?

9 A No, I, I, I don't know why it's not in the minutes.

10 Q Did NMTV have an annual meeting in 1993 to elect  
11 officers and directors?

12 A That was our practice.

13 MR. COHEN: Again, I'm making a representation to  
14 the court, and to you, Mrs. Duff, that we have no minutes of  
15 such a meeting.

16 BY MR. COHEN:

17 Q Can you tell me whether minutes were prepared?

18 A We may not have had a meeting. I know that there  
19 was one year that we did not have a meeting and I, I couldn't  
20 say exactly whether it was, was '83 -- what year it was.

21 Q Could, could I --

22 MR. COHEN: Could we get a stipulation, could I ask  
23 Mr. Topel, Your Honor, for a -- whether we can stipulate that,  
24 that no minutes were supplied reflecting an annual meeting in  
25 1993 at NMTV?



1 MR. TOPEL: Right, what I'll stipulate to, there,  
2 there are minutes of at least one meeting that I recall that  
3 took place in 1993 but I don't recall minutes of a meeting  
4 designated "annual meeting" and calling for a new election of  
5 officers. I believe that's correct.

6 MR. COHEN: Well, Your Honor, I wonder if I could,  
7 if I could -- could I address Mr. Topel in this case?

8 JUDGE CHACHKIN: Yes.

9 MR. COHEN: My understanding, and I think the Bureau  
10 concurs, and if I'm, if I'm in error the Bureau will tell me,  
11 that, that there was no -- there were no minutes supplied or  
12 produced in discovery which reflected the election of officers  
13 and directors in 1993.

14 MR. TOPEL: A new election, I think that's right.

15 MR. COHEN: And that's what I'd like to get --  
16 that's what I'd like to have as stipulation.

17 JUDGE CHACHKIN: The witness agree with that  
18 statement of counsel?

19 MRS. DUFF: Yes.

20 JUDGE CHACHKIN: Let's continue, then.

21 BY MR. COHEN:

22 Q Now, did, in fact, officers and directors -- were  
23 they in fact elected?

24 A I don't believe our bylaws require that we elect  
25 officers each and every year.

1           Q     So in point of fact, then, what you're -- are you,  
2 are you testifying that officers and directors were not  
3 elected in 1993?

4           A     I don't believe they were.

5           MR. TOPEL: Well, let, let me say I, I think if  
6 we're proceeding on stipulation, that's not correct in the  
7 case of Pastor --

8           MR. COHEN: I'm going to get to him. I know what  
9 you're going to talk about and I'll -- going to get to that  
10 next.

11           MR. TOPEL: Yeah, but there was a director and an  
12 officer --

13           MR. COHEN: I'm going to get to that next. Now,  
14 what my --

15           MR. TOPEL: -- elected, okay. I'm not sure where  
16 that leads us but --

17           BY MR. COHEN:

18           Q     What, what Mr. Topel, I'm sure, is alluding to,  
19 ma'am, is the election of Pastor Ramirez.

20           MR. TOPEL: Right.

21           MR. COHEN: Yes.

22           BY MR. COHEN:

23           Q     And I'd like to show you to help your memory -- I'd  
24 like to show you if I can find it here.

25

(Pause.)

1 MR. COHEN: Do you wish to see this first,  
2 Your Honor?

3 JUDGE CHACHKIN: No, go ahead. Show it to the  
4 witness.

5 BY MR. COHEN:

6 Q I want to show you, ma'am, a -- your counsel has  
7 seen this. This is a, a letter, a covering letter, on the  
8 letterhead of May & Dunne containing an amendment --  
9 containing a notification, rather, signed by you, which was  
10 dated May 7, 1993, which, which reflects that Mr. Armando  
11 Ramirez was elected as a director and a vice president, and  
12 I'd like you to look at that document. I apologize for not  
13 having other copies. I didn't know it would be necessary. Do  
14 you recognize that document?

15 A Yes.

16 Q Now, was -- I don't think the document states --  
17 does it, does it bother you if I look over your shoulder?

18 MR. COHEN: If it does, I don't want to do that,  
19 Your Honor. Would that bother the witness? Should I take it  
20 back?

21 JUDGE CHACHKIN: Whatever is necessary, Mr. Cohen,  
22 in this matter.

23 MR. COHEN: I don't want to --

24 JUDGE CHACHKIN: Counsel will protect the witness's  
25 interests then. Go ahead.

1 MR. COHEN: I don't want --

2 JUDGE CHACHKIN: Expresses no opposition; you can do  
3 so.

4 BY MR. COHEN:

5 Q I notice it says, "Mr. Ramirez was elected on -- and  
6 on that same day," -- meaning May 7, "Mr. Ramirez was elected  
7 as a director and vice president." Do you see that?

8 A Yes.

9 Q Now, at this -- on the date that Mr. Ramirez was  
10 elected as a director and a vice president, was -- were any  
11 other officers or directors re-elected or elected?

12 A I, I don't, I don't remember.

13 MR. TOPEL: Your Honor, may I make a statement?  
14 Because Mr. Cohen has misread the document.

15 MR. COHEN: If I did, I didn't do it intentionally.

16 MR. TOPEL: Just, just for the record, because what  
17 it says is that "Reverend Aguillar's resignation became  
18 effective April 20, 1993, and on that same day, Mr. Armando  
19 Ramirez was elected as a director as well as a --"

20 MR. COHEN: Excuse me, your point is well taken.

21 MR. TOPEL: Just so the record is clear because  
22 there are minutes of that April 20 meeting.

23 MR. COHEN: Correct.

24 MR. TOPEL: I don't want there to be any  
25 discrepancy.

1 MR. COHEN: Mr. Topel has accurately stated it.

2 BY MR. COHEN:

3 Q Now, my question is the same, do you -- at the time  
4 that Mr. Ramirez was elected an officer and director which,  
5 I'm standing corrected, was now reflected as in April, were  
6 other officers and directors elected? That's my question.

7 A If I saw the minutes, I would be able to attest to  
8 that but with them not in front of me, I --

9 Q Well, I'll show you the minutes, then.

10 MR. SHOOK: Mr. Cohen --

11 MR. COHEN: Yeah, what -- can you help me?

12 MR. SHOOK: Yes, Bureau Exhibit 412.

13 MR. COHEN: Bureau Exhibit 412. Here it is, 412 --

14 MR. TOPEL: Excuse me, Mr. Cohen, why, why don't --  
15 Tab EE, page 42 of the witness's own testimony has those  
16 minutes so let me get that for her? Your Honor, it's Tab EE,  
17 page 42.

18 JUDGE CHACHKIN: "Whereby" does it start?

19 MR. TOPEL: It's Volume 2A-4. The one that says TBF  
20 Exhibit 101, Volume 4.

21 JUDGE CHACHKIN: All right, it's not important for  
22 me to see it. Go ahead with your questioning, Mr. --

23 MR. COHEN: Yeah.

24 BY MR. COHEN:

25 Q Does that help your, help your memory?

1           A     And your question?  Would you repeat the question  
2 please?

3           Q     Yes.  At that time, were any other officers or  
4 directors of NMTV elected or re-elected?

5           A     It doesn't appear that they were.  There was -- that  
6 was -- there was no other action for election of officers  
7 taken at that meeting.

8           Q     Now, has this stimulated your memory on the, on the  
9 question or is there anything else you could add to this or --  
10 as to whether officers and directors were elected in 1983,  
11 other than Mr. Ramirez.

12                   MR. TOPEL:  1993.

13                   MR. SHOOK:  1993.

14                   BY MR. COHEN:

15           Q     1993.  Other than Mr. Ramirez?

16           A     All I can attest to is what I've just read in the  
17 minutes.

18           Q     Very good.  Am I correct -- I'm going to turn to  
19 something else.  Am I correct that the minutes of NMTV held  
20 on -- the meeting that was held on March 20, 1993, originally  
21 the minutes reflected that the meeting was held on March 20th,  
22 1993, and not April 20, 1993 -- strike that.  I want to strike  
23 that.

24                   MR. TOPEL:  Mr. Cohen, you might want to repeat the  
25 question.

1 MR. COHEN: Okay.

2 BY MR. COHEN:

3 Q Am I correct that we have two sets of minutes for  
4 the meeting held on April 20, 1993; one states April 20, 1993,  
5 and another states March 20, 1993, and that the March 20,  
6 1993, minutes were in error insofar as the date was concerned?

7 A The date was not correct.

8 Q Do you know how, do you know how that error caused  
9 to be made -- how that error came to be made?

10 A No, I don't.

11 Q Now, those minutes, that is, of the April 20  
12 meeting, they were prepared by Mr. Juggert, Norman Juggert, is  
13 that correct?

14 A Yes.

15 Q I want to ask you about the minutes of the meeting,  
16 and I want to refer, refer you to the fourth, the fourth  
17 paragraph, and read the paragraph to yourself. This is in  
18 evidence now.

19 (Pause.)

20 A Yes.

21 Q Now, the person who was responsible for dealing with  
22 Prime Time Christian Television was you, correct?

23 A That's correct.

24 Q And who was the principal of Prime Time Christian  
25 Television that you were dealing with?

1           A     Mr. Cohen, the, the paragraph you -- oh, I'm sorry,  
2 I read the wrong paragraph.

3           Q     Well, take your time.

4           A     Okay.

5                 MR. TOPEL: Mrs. Duff, take your time and read the  
6 correct one.

7                 MRS. DUFF: Thank you.

8                 (Pause.)

9                 MRS. DUFF: Yes.

10                BY MR. COHEN:

11           Q     Okay. I'm now talking about the paragraph that  
12 deals with the beginning of the debt of \$650,000 that Prime  
13 Time Christian Television owed NMTV.

14           A     Yes.

15           Q     Okay, and am I correct that you were the person that  
16 dealt with Prime Time Christian Television on that matter?

17           A     That's correct.

18           Q     And who was the name of the, of the principal of  
19 Prime Time you were dealing with?

20           A     Al Cooper.

21           Q     And am I correct that you requested from Mr. Cooper  
22 financial information to independently determine what the  
23 financial condition of Prime Time Christian Television was?

24           A     Yes.

25           Q     And he provided that information to you, didn't he?



1 A Yes.

2 Q And that was written information, correct?

3 A I don't -- you know, I really can't remember whether  
4 it was provided in written form or not.

5 Q In any event, he provided financial information to  
6 you, correct?

7 A I'm not absolutely sure that he did.

8 Q Well, didn't you request from Mr. Cooper financial  
9 information to independently determine what the financial  
10 condition of Prime Time Christian Television was?

11 A I'm, I'm just not able to recollect having seen it.  
12 I'm -- my memory doesn't serve me that well.

13 Q Well, let me show you a --

14 MR. COHEN: Do you have a copy of the deposition,  
15 Howard? Mine is marked up and I don't want to --

16 MR. TOPEL: Will it help your memory any?

17 BY MR. COHEN:

18 Q Look at page -- October 8th, line -- yeah, page 27,  
19 line 7 through 12. Okay.

20 (Pause.)

21 MR. TOPEL: Your Honor, with Mr. Cohen's permission,  
22 I would like the witness to read the preceding --

23 MR. COHEN: She can read as much as wishes.

24 MR. TOPEL: -- portion of the deposition, and  
25 he's -- you can read this to yourself.